

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING AGREED ORDER GRANTING
VIVVENTE BROWN LIMITED RELIEF FROM THE AUTOMATIC STAY**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On January 15, 2025 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

2. Following the Petition Date, Vivvente Brown (“Claimant”) made requests upon the Debtors to consent to certain limited relief from the automatic stay to allow the Claimant to continue and prosecute a certain prepetition lawsuit as against Debtor Jo-Ann Stores, LLC (the “Prepetition Action”), solely to the extent of available insurance proceeds or coverage available from any insurer of the Debtors, subject to the limits and terms and conditions of any applicable policies.

3. Following good faith negotiations, the Debtors have indicated that they would consent to the Court granting Claimant limited relief from the automatic stay under the terms and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

conditions set forth in the proposed *Agreed Order Granting Vivvente Brown Limited Relief from the Automatic Stay* (the “Proposed Agreed Order”) attached hereto as **Exhibit A**, which is agreed to by the Claimant.

4. Counsel to the official committee of unsecured creditors has reviewed the Proposed Agreed Order and has no objections the Court’s approval and entry of same.

5. Accordingly, the Debtors and Claimant respectfully request that the Court enter the Proposed Agreed Order at its earliest convenience.

Dated: May 30, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

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